

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: BOSTON SCIENTIFIC CORP.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2326

THIS DOCUMENT RELATES TO ALL CASES

PLAINTIFFS' FIRST NOTICE TO TAKE VIDEO DEPOSITION OF
DESIGNEE(S) OF BOSTON SCIENTIFIC CORPORATION
PURSUANT TO FED. R. CIV. P. 30(b)(6)

TO: Defendant Boson Scientific Corporation, by and through its attorney of record in
the above-captioned action, Jon A. Strongman, Shook, Hardy & Bacon, LLP, 2555
Grand Boulevard, Kansas City, Missouri 64108.

Notice is hereby given that Plaintiffs in the above-captioned MDL proceeding will
take the deposition and videotaped examination of Defendant Boston Scientific
Corporation ("BSC"), pursuant to Federal Rule of Civil Procedure 30(b)(6), on May 22,
2014 at 9:00 a.m. Eastern Standard Time, and from day to day thereafter until said
deposition is concluded, in the offices of Janet, Jenner & Suggs, LLC, 31 St. James Avenue,
Suite 365, Boston, Massachusetts, or such other location as may be agreed upon by counsel
prior to said date. BSC is hereby advised of its duty pursuant to Fed. R. Civ. P. 30(b)(6),
to designate and present at said deposition the person or persons who are most
knowledgeable and can testify as to the following subject matters:

1.

All aspects of the mesh manufacturing part of the production process regarding the: (a) Obtryx Transobturator Mid-Urethral Sling System (both Halo and Curved); (b) Obtryx II (both Halo and Curved); (c) Lynx Suprapubic; (d) Advantage Mid-Urethral Sling; (e) Advantage Fit Mid-Urethral Sling; (f) Solyx Single Incision Sling; (g) Pinnacle Pelvic Floor Repair Kit Anterior Apical; (h) Pinnacle Pelvic Floor Repair Kit Posterior; (i) Pinnacle Duet Pelvic Floor Repair Kit; (j) Uphold Vaginal Support System; (k) Pinnacle LITE; and (l) Uphold LITE (Products identified as a-l, above, are hereinafter collectively referred to as “BSC Mesh Products”).

2.

The specifications required by BSC for the raw polypropylene used by it in the manufacture of BSC Mesh Products.

3.

The business relationship between BSC and Chevron Phillips Chemical, including BSC’s ownership interest in Chevron Phillips Chemical.

4.

The business relationship between BSC and Channel Prime Alliance, including BSC’s ownership interest in Channel Prime Alliance.

5.

The business relationship between BSC and Luxilon Industries, including BSC’s ownership interest in Luxilon Industries.

6.

The business relationship between BSC and Proxy Biomedical, including BSC's ownership interest in Proxy Biomedical.

7.

The business relationship between BSC and Medventure Associates, including BSC's ownership interest in Medventure Associates.

8.

The vendors from which BSC purchased polypropylene for use in BSC Mesh Products.

9.

Any quality control measures taken to prevent polypropylene degradation during the manufacturing process of BSC Mesh Products.

10.

Any testing done, regularly or randomly, to detect degradation of BSC Mesh Products during the manufacturing process.

NOTICE TO PRODUCE

The individual(s) selected to respond to this Notice shall produce to undersigned at least twenty-one (21) days before the deposition any and all of the documents, digital or written materials that are responsive to the above-listed designated subjects or were used to prepare the corporate designee. Alternatively, as to any that have been previously produced in this action (other than those used to prepare the corporate designee) the

responsive documents may be identified by specific Bates Numbers provided the specific Bates Numbers are furnished to Plaintiffs' counsel 10 working days prior to the date of the deposition.

Dated: April 18, 2014

/s/ Aimee H. Wagstaff
Aimee H. Wagstaff
Colorado Bar No. 36819
Plaintiffs' Lead Counsel and
Member of Plaintiffs' Steering Committee

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